

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Dkt. No 1:13-md-2419 (FDS)

THIS DOCUMENT RELATES TO:

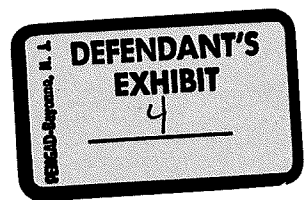
All Actions

AFFIDAVIT OF DEBRA SCHAMBERG, RN

STATE OF TENNESSEE
COUNTY OF DAVIDSON

Comes Debra Schamberg, RN, after first being duly sworn, and states as follows:

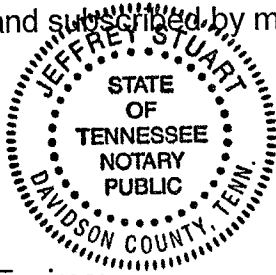
1. I am over 18 years of age, have personal knowledge of the facts contained herein, and am competent to testify to same.
2. I am the Facility Director of Saint Thomas Outpatient Neurosurgical Center, LLC ("STOPNC"). I am also a registered nurse.
3. STOPNC began ordering steroids from the New England Compounding Center ("NECC") in June of 2011.
4. I do not know exactly how long it will take STOPNC to compile the requested information. It will take an extensive amount of time because STOPNC will have to go through every daily patient schedule from June 2011 (when STOPNC began ordering from NECC) to mid-September 2012 and examine the patient charts for each patient on the schedule to determine whether the patient received NECC medication. Over 7,000 procedures were performed during that time period.
5. My best estimate is that it will take approximately two months for STOPNC to identify all patients who received NECC products, including name, date of birth, social security number, address, phone number, and medication administered, as requested by the subpoena from the Plaintiffs' Steering Committee.
6. STOPNC will have to hire a new staff member to complete the task. I estimate it will cost approximately \$5,000 to hire the new staff member, but that is just a rough estimate.



7. STOPNC is not aware of any of its patients becoming ill from NECC medications outside the three contaminated lots of methylprednisolone acetate.

Helena Schamberg
(Signature of Affiant)

Sworn to and subscribed by me on this 10th day of July, 2013.



[Signature]
(Notary Public)

My Commission Expires My Commission Expires MAY 20, 2014